

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Todd M. Swensen
5 Assistant United States Attorney
6 402 E. Yakima Avenue, Suite 210
7 Yakima, Washington 98901
8 (509) 454-4425

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

1:23-CR-02036-MKD-1

Plaintiff,

AMENDED UNITED STATES'
SENTENCING MEMORANDUM

RONALD LEE RALSTON, JR.,

Defendant.

The United States of America, by and through Vanessa R. Waldref,
United States Attorney for the Eastern District of Washington, and Todd M.
Swensen, Assistant United States Attorney, submits the following United States'
Sentencing Memorandum:

I. Offense Level & Criminal History:

The United States concurs with the Presentence Investigation Report (PSR) that the minimum term of imprisonment here is 10 years in accordance with 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii) and 846. *See ¶ 239.* The United

States likewise does not object to the PSR with regards to the calculated base offense level of 38 and Total Offense Level calculation of 35. *See ¶¶ 42-51; 240.* The United States also concurs with Probation's assessment of Defendant's criminal history category of II. *See ¶ 259.* That said, the United States, in good faith, entered into an agreement with the Defendant wherein the United States agreed to recommend incarceration at the low-end of the Guidelines range, which at the time, the United States reasonably believed would be based on a total base offense level of 33, and which the United States believed was a reasonable and sufficient sentence.

II. Departures:

Based on the United States' agreement with the Defendant, the United States will be requesting a departure from the PSIR Guidelines range to the agreed upon range of 151-188 months incarceration.

III. 18 U.S.C. § 3553(a):

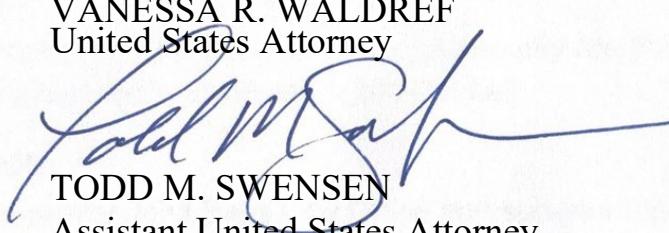
The United States has no Section 3553(a) information beyond what is included in the PSR. The United States does not object to the guideline range detailed in the PSR is accurate; however, because the United State agreed to recommend a low-end Guidelines range according to a total base offense level of 33, the United State will honor its agreement and recommend a sentence of 151

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1 months' incarceration. The United States believes this is a sufficient sentence but
2 not greater than necessary to comply with the purposes of 18 U.S.C. § 3553.

3 DATED this 27th day of February 2024.
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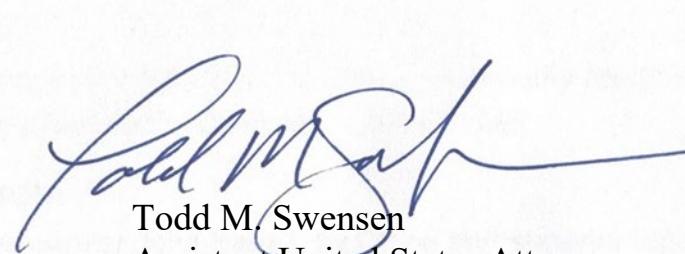
5 VANESSA R. WALDREF
6 United States Attorney

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8 TODD M. SWENSEN
9 Assistant United States Attorney

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11 CERTIFICATE OF SERVICE
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13 I hereby certify that on February 27, 2024, I electronically filed the
14 foregoing with the Clerk of the Court using the CM/ECF System, and a copy was
15 emailed to the counsel of record in this case: Ulvar Klein.
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17 
18 Todd M. Swensen
19 Assistant United States Attorney
20 United States Attorney's Office
21 402 E. Yakima Ave., Suite 210
22 Yakima, WA 98901
23 (509) 454-4425
24 Fax: (509) 249-3297